

EXHIBIT A

(Declaration of Justin Parks)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ERICA FRASCO, et al., individually and on
behalf of all others similarly situated,

Plaintiff,

v.

FLO HEALTH, INC., GOOGLE, LLC,
FACEBOOK, INC., APPSFLYER, INC., and
FLURRY, INC.,

Defendants.

Case No. 3:21-cv-00757-JD

**DECLARATION OF JUSTIN PARKS
OF A.B. DATA**

I, Justin Parks, declare as follows:

1. I am a Vice President with A.B. Data, Ltd. (“A.B. Data”). I am fully familiar with the facts contained herein based upon my personal knowledge, and if called as a witness, could and would testify competently thereto. I submit this Declaration at the request of the Parties in connection with the above-captioned action.

2. Previously, I submitted a declaration, *Declaration of Justin Parks of A.B. Data Regarding the Proposed Notice Plan and in Support of Plaintiffs’ Motion for Preliminary Approval of Class Settlement with Defendant Flurry LLC* (Dkt. No. 589-11), outlining my and A.B. Data’s credentials, including in recent data breach and consumer privacy matters, and provided an updated profile of A.B. Data’s background and capabilities in the declaration, *Declaration of Justin Parks of A.B. Data in Support of the Parties Joint Proposed Pretrial Class Notice Plan* (Dkt. No. 617).

3. A.B. Data has been acting as Notice Administrator in this case regarding the recently completed notification plan (“Notice Plan”). My previous declaration, *Declaration of Justin Parks of A.B. Data on Implementation of Notice Plan* (Dkt. 694-1) described the implementation of the Notice Plan and how it provided notice to the nationwide class and California subclass in this action.

4. This Declaration provides the Court with updated administration and exclusion information. It is based upon my personal knowledge and upon information provided to me by my associates, and A.B. Data staff members.

5. As of July 14, 2025, there have been 55 calls to the toll-free telephone number.


6. As of July 14, 2025, there have been 148,299 unique visitors to the website.

7. As of July 14, 2025, A.B. Data has received 31 emails.

8. The deadline for Class Members to request exclusion from the class (and subclass) is July 20, 2025. As of July 14, 2025, A.B. Data has received 44 unique exclusion requests (46 online exclusions were received, of which two are duplicates). The complete list of validated exclusion requests will be provided to the Court after the exclusion deadline.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 14th day of July 2025 in Minneapolis, Minnesota.


Justin Parks
Vice President, A.B. Data, Ltd.
Class Action Administration Division